

1 Honorable Marsha J. Pechman
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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 FAN JIANG,

16 v. Petitioner,
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18 UNITED STATES CITIZENSHIP AND
19 IMMIGRATION SERVICES, United STATES
20 DEPARTMENT OF HOMELAND
21 SECURITY; ALEJANDRO MAYORKAS,
22 Secretary of the Department of Homeland
23 Security; UR JADOU, Direction of U.S.
24 Citizenship and Immigration Services; and
DONNA CAMPAGNOLO, Director of U.S.
Citizenship and Immigration Services
California Service Center,

25 Respondents.

26 NO. C21-1656-MJP

27 STIPULATION AND ~~PROPOSED~~
28 ORDER TO STAY ACTION

29 NOTED ON MOTIONS CALENDAR:

30 **January 27, 2022**

31
32 **Stipulation**

33 The parties have conferred and stipulate and agree as follows. In light of ongoing
34 adjudication of Petitioner's application, the results of which may render these proceedings moot or at
35 least have a relevant impact upon these proceedings, the parties jointly request a stay of this action

1 for an initial period ending on March 18, 2022. During the period of the initial stay and upon
2 Petitioner Jiang's receipt of a "Request for Evidence" from Respondent USCIS pursuant to
3 Respondent's adjudication of Petitioner's claim, the parties will confer and promptly propose to the
4 Court a requested extension of the stay, if warranted.

5 Respectfully submitted and presented this 27th day of January, 2022.

<p>6</p> <p>7</p> <p>8</p> <p>9 <u>/s/Ralph Hua</u></p> <p>10 RALPH HUA, WSBA# 42189</p> <p>Fisher Phillips LLP</p> <p>1201 3rd Avenue, Suite 2750</p> <p>Seattle, WA 98104</p> <p>Phone: 206-247-7014</p> <p>E-mail: rhua@fisherphillips.com</p> <p>11</p> <p>12 <i>Attorney for Petitioner</i></p>	<p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>NICHOLAS W. BROWN</p> <p>United States Attorney</p> <p><u>/s/ Patricia D. Gugin</u></p> <p>PATRICIA D. GUGIN, WSBA #43458</p> <p>Assistant United States Attorney</p> <p>United States Attorney's Office</p> <p>1201 Pacific Avenue, Suite 700</p> <p>Tacoma, Washington 98402</p> <p>Phone: 253-428-3832</p> <p>Fax: 253-428-3836</p> <p>E-mail: pat.gugin@usdoj.gov</p> <p><i>Attorneys for Respondents</i></p> <p>STIPULATION FOR STAY OF ACTION</p> <p>No. C20-1656-MJP - 2</p> <p>UNITED STATES ATTORNEY</p> <p>1201 PACIFIC AVENUE, SUITE 700</p> <p>TACOMA, WASHINGTON 98402</p> <p>(253) 428-3800</p>
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ORDER

IT IS SO ORDERED.

Dated this 27th day of January, 2022.

John R. Blunt

JAMES L. ROBART
United States District Judge

Presented by:

/s/ *Ralph Hua*

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24 STIPULATION FOR STAY OF ACTION
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